

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
CENTRAL DIVISION

FILED  
IN CLERKS OFFICE

GERALD F. RICHARDS,

Plaintiff,

v.

SOUTHBRIDGE POWER & THERMAL,  
LLC.

Defendant.

2004 APR 22 P 1:11  
CIVIL ACTION NO. 04-40054 NMG

U.S. DISTRICT COURT  
DISTRICT OF MASS.

**DEFENDANT'S MOTION FOR ADMISSION OF COUNSEL**  
**PRO HAC VICE**

The Defendant, Southbridge Power & Thermal, LLC, hereby moves by undersigned counsel, Patrick J. Markey, pursuant to Local Rule 83.5.3(d) for the admission *pro hac vice* of Douglas B. Sanders, Esq. to appear and practice in this Court as co-counsel for the Defendant in this proceeding. In support of this Motion, please see the attached Affidavit of Douglas B. Sanders.

Respectfully submitted,

SOUTHBRIDGE POWER AND  
THERMAL, LLC.

By: 

Patrick J. Markey, Esq.

Robinson Donovan, P.C.

1500 Main Street – Suite 1600

Springfield, MA 01115

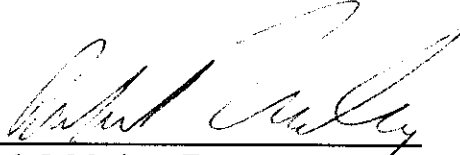
413-732-2301

BBO No.: 568124

CERTIFICATE OF SERVICE

I, Patrick J. Markey, Esq., hereby certify that on this 21<sup>st</sup> day of April, 2004, I served a copy of the above upon the parties in the action by mailing, postage prepaid, to counsel, Charlotte E. Glinka, Keches & Mallen, P.C., 122 Dean Street, Taunton, MA 02780.

Subscribed under the penalties of perjury.

  
\_\_\_\_\_  
Patrick J. Markey, Esq.

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AFFIDAVIT OF DOUGLAS B. SANDERS


I, Douglas B. Sanders, hereby depose and say:

1. I am over the age of eighteen (18) years and understand the obligations of an oath.
2. I am a member of the law firm of Baker & McKenzie.
3. My office address is 130 E. Randolph Drive, Chicago, Illinois 60601
4. Service of all papers may be made upon Patrick Markey, Robinson Donovan Madden & Barry, Tower Square, Suite 1600, 1500 Main Street, Springfield, MA 01115, a member of the bar of this Court having an office within the District of Massachusetts.
5. I am admitted to practice before the following courts: State of Illinois (1998), Northern District of Illinois (1998) and Court of Appeals for the Seventh Circuit (2001).

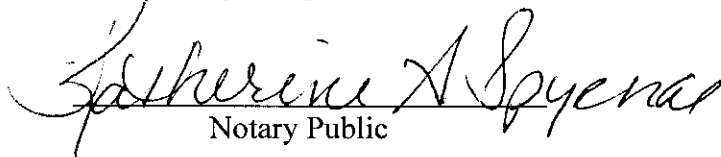
6. I have never been denied admission to or disciplined by this Court or a court in any other jurisdiction.

7. I am in good standing in all jurisdictions where I have been admitted to practice.

8. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

  
\_\_\_\_\_  
Douglas B. Sanders

Subscribed and sworn to before me  
this 19th day of April, 2004

  
\_\_\_\_\_  
Notary Public

My commission expires: 4/26/07

